

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of)	FEDERAL COMMUNICATIONS COMMISSION
)	OFFICE OF THE SECRETARY
Requests for Waiver of the)	
Commission's Requirements in)	
CC Docket No. 96-128)	
(Payphone Compensation))	CC Docket No. 96-128
)	

COMMENTS OF
THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY
ON PETITIONS FOR WAIVER

The Southern New England Telephone (SNET) submits these comments in support of certain proposals on issues raised in the Petitions for Waiver filed by the United States Telephone Association (USTA),¹ and the LEC ANI Coalition.² SNET's Comments discuss its own circumstances in complying with the Commission's requirements concerning issues relating to payphone-specific coding digit requirements.³ SNET also strongly supports USTA's request that LECs be permitted to provide codes to identify payphone calls in ways to comport with the technological mandates of LECs. LIDB OLNS is being deployed at SNET and is sufficient to meet the per-call tracking obligations of IXCs.

¹ Petition for Waiver, United States Telephone Association, CC Docket No. 96-128, September 30, 1997.

² Letter to John Muleta, Chief, Enforcement Division, Common Carrier Bureau, from Michael K. Kellogg, Counsel for the LEC ANI Coalition, July 28, 1997.

³ Order on Reconsideration, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, released November 8, 1996.

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SNET also supports the LEC ANI Coalition that the deadline for compliance should be extended if the Commission should issue an order providing clarification of the LECs' payphone-specific coding requirements. If the Commission determines that further clarification of the coding requirements is necessary and that LIDB OLNS may not meet the coding requirements⁴ for payphone compensation purposes, SNET should be immediately relieved of its deadline to provide LIDB OLNS for toll fraud purposes, as required in CC Docket No. 91-35,⁵ so that it can avoid expending any unnecessary expenses for LIDB OLNS.

I. BACKGROUND

The Commission's Third Report and Order in CC Docket No. 91-35, Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, required LECs to provide a federally tariffed Originating Line Screening (OLS) service to provide a discrete code to identify privately-owned payphones and such other codes as are necessary to identify other categories of aggregator locations. The Order identified two types of provisioning options which would meet the Commission's requirements⁶ to provide this federally-tariffed service -

⁴ If SNET is required to provide Flex ANI for CC Docket No. 96-128 for payphone compensation purposes, SNET would propose to send ANI ii of "70" for all payphone lines because multiple ANI ii codes of "07, 27, 29 and 70" are specific for fraud purposes.

⁵ Third Report and Order, Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, CC Docket No. 91-35, April 5, 1996.

⁶ Id.

flexible automatic numbering identification (Flex ANI), or an OLS service offered through the Line Identification Data Base (LIDB). SNET conducted extensive research to understand the technical, financial and administrative impact of both technologies to determine the optimum solution to comply with the Commission's Order and to serve the anticipated needs of its customers.

In SNET's case, the best solution to comply with the Commission's requirement of identifying privately-owned payphones and aggregator locations was implementation of LIDB OLNS. SNET's analysis of its LIDB OLNS capabilities also concludes that LIDB OLNS will also meet the compensation requirements of the Commission's Payphone Orders.

If SNET is required to reconsider its decision of implementing LIDB OLNS in order to deploy Flex ANI, considerable financial and technical resources will have been wasted, along with the burden of expended additional resources to implement the alternative system of Flex ANI. Most importantly, there is no apparent benefit to consumers or payphone owners by requiring a cost-intensive technology such as Flex ANI.

**II. SNET SUPPORTS USTA IN THAT LECs SHOULD BE
PERMITTED TO USE LIDB OLNS TO PROVIDE INFORMATION
THAT WILL PERMIT IXCs TO COMPENSATE PSPs.**

SNET concurs with USTA that a "one-size fits all" methodology of providing the specific payphone coding digits is not reasonable given the distinct and individual technical,

financial and administrative circumstances facing LECs across the country.

SNET agrees with USTA that, "the per-call tracking capability of carriers receiving coding information varies. But the technical and financial ability of LECs [*like SNET*] to provide information designed to identify payphone calls for per-call tracking purposes also varies from company to company. LECs [*like SNET*] should not be required to shoulder the technical, financial and administrative burdens of providing a specific form of payphone coding information when alternative OLS technologies are available and sufficient to meet the per-call tracking obligations of IXC⁷s."

SNET has previously made the Commission aware of its own unique circumstances with respect to the provision of payphone-

⁷ USTA Petition for Waiver, p. 4.

specific coding digits⁸ in a Petition for Waiver, on July 3, 1996, and in a letter to John Muleta, Deputy Chief, Common Carrier Bureau, on October 4, 1997.

SNET is working towards the implementation of LIDB OLNS to support its tariff filing on December 1, 1997. SNET was unable to begin LIDB OLNS implementation until April, 1997, therefore, a Waiver was requested. In response to this request, SNET was granted a waiver on July 31, 1997 from the Commission to delay the filing of a LIDB OLNS tariff until December 1, 1997 in order to meet its toll fraud screening requirements under CC Docket No. 91-35.

In SNET's particular situation, the use of Flex ANI would constitute a considerably higher financial, technical and administrative investment than LIDB OLNS to serve a small percentage of its payphones. SNET supports USTA's proposal that LECs be allowed to use the best technology they select to provide information that will permit IXCs to track payphone calls for compensation purposes.

⁸ Petition for Waiver of the Commission's Requirement to Tariff Operator Line Screening, CC Docket No. 91-35, July 3, 1996; Ex-Parte of the Policies and Rules Concerning Operator Service Access and Payphone Compensation, CCB/CPD 96-18, September 16, 1996; and Petition for Expedited Waiver of the Policies and Rules Concerning Operator Service Access and Payphone Compensation, CC Docket No. 91-35, July 14, 1997.

IV. CONCLUSION

In conclusion, SNET agrees with USTA that LECs, like SNET, should be permitted to use their own coding-specific information and judgment in selecting the underlying technology to provide information that will permit IXCs to track payphone calls for compensation purposes. SNET also supports the LEC ANI Coalition that the deadline for compliance be extended until the Commission issues an order providing clarification of the LECs' payphone-specific coding requirements.

Respectfully submitted,

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TELEPHONE COMPANY

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October 30, 1997

CERTIFICATE OF SERVICE

I, Barbara C. Majeski, hereby certify that SNET's Comments for Petitions of Waiver of Payphone Coding Digits Requirements, has been filed this 30th day of October, 1997, and hand delivered to all parties listed below.


Barbara C. Majeski

William F. Caton
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(Original plus six copies)

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